

## **EXHIBIT 1**

## DECLARATION OF JOHN DOE 1

I, John Doe 1, declare and state the following:

1. I am 17 years old. I was born in Tamaulipas, Mexico.
2. I came to the United States right after I turned 15. I believe it was in August.
3. I was taken into custody by immigration authorities as soon as I crossed the border. I was sent to BCFS in San Antonio, Texas, and I stayed there for a few months until I was transferred to Mercy First, a treatment center in New York, for psychological issues.
4. After a short time in New York, I was transferred to NOVA, a staff secure facility in Virginia. Then I was sent to Shenandoah.
5. I was detained at Shenandoah for over a year and a half, from April 2016 to December 2017.
6. I have been diagnosed with depression and other disorders, and I take medications for them. I think they increased the dosage of my depression medication when I came to Shenandoah. At first it made my symptoms worse, and I didn't feel like getting out of bed or doing anything, but then I got used to it.
7. For most of my time at Shenandoah, I was placed in Alpha Pod. It is for kids who have misbehaved.
8. We would get points awarded for good behavior and points taken away for bad behavior. If you had all of your points at the end of the week, you could buy things like toothpaste and soap. I regularly got points taken away for things like not wanting to work on the mural in art class, complaining about a headache, or throwing a ball that hit the ceiling in the gym.
9. At Shenandoah, my room had a mattress, a sink, and a toilet. There is no wall or divider

in the room, and the staff could see into the rooms through a window in the door. The kids would sometimes put a piece of paper over this window so people couldn't see them using the toilet, but the staff would remove it. One time a staff member stood at my doorway and watched me use the bathroom.

10. While I was at Shenandoah, staff members would make fun of me on a daily basis. They would call me names such as "pendejo" and "onion head," and do things like drop my clean towel on the dirty floor in front of me. They were always trying to provoke me.
11. I once became so frustrated by a staff member's repeated mocking that I pushed the staff member. In response, four staff members shoved me to the floor and piled on top of me, and they began hitting me in my abdomen with their elbows. I had a lot bruises from this.
12. There are American and Latino kids at Shenandoah. The Latino kids are treated differently than the American kids.
13. Staff frequently refused to allow us to watch Spanish shows on the TV in our pods. They would tell us they didn't care what we wanted and didn't care that we were Latino.
14. On one occasion, I got into a fight with one of the American kids after he had taunted me and told me that he "hates Latinos". When staff broke up the fight, I was grabbed and thrown forcefully to the ground, but the other kid was just held by the arms and pulled away. I was then restrained, tied to a chair, and hit several times by staff members while I was tied to the chair. I was left tied to the chair in my room for four hours.
15. They tied me to a chair about five times while I was at Shenandoah. My hands, legs and chest were tied to the chair. On some occasions they put something over my head. It had small holes that I could see out of, but only a little.
16. I was assaulted by Shenandoah staff on many occasions while I was detained there, and

several times while I was tied to a chair. On one occasion, I was hit in the face and scratched by a staff member while I was restrained. I developed a black eye and bruising from this.

17. On another occasion, I asked to come inside during gym because I had a headache. Staff suspected, for no apparent reason, that I may have found a piece of glass outside. I was thrown to the ground and searched, and my clothes were shredded. Though they found nothing, staff transferred me to Alpha Pod after this incident.
18. I saw other kids being hit by staff too. I once tried to defend another kid when a staff member was hitting him. As a result, the other kid and I were both stabbed by the staff member with a pen.
19. Another time, a staff member entered my room when I didn't want him to and provoked a fight. The staff member hit me, and I bit the staff member. Thereafter, the staff member beat me, leaving me with bruises on my neck and arms. A supervisor took photographs of my injuries. I have asked for these photos repeatedly, but staff members have never given them to me.
20. After this incident, I was placed in cha-chas (handcuffs). I was forced to wear handcuffs on my wrists and shackles on my feet for approximately 10 days in a row. During this time, the handcuffs were only removed when I was sleeping or eating alone in my room.
21. The handcuffs are very tight, and they often left bruises and cuts on my wrists after they were taken off. I complained about this and showed my injuries to the staff, but they took no action.
22. At Shenandoah, I was also placed on restriction a lot. This happened whenever kids would act out or hit the staff, or if they hurt themselves. When you are restricted, you are largely

in your room and you can't leave. When you are outside your room, staff place you in handcuffs. I have been restricted in my room for several days at a time. I was only allowed to leave my room for classes.

23. Soon after I arrived at Shenandoah, I began to hurt myself. I would cut my wrists with a piece of glass or plastic, whatever I could find. I would sometimes bang my head against the wall or the floor because I was angry and sad.
24. Staff members saw the scars on my wrists and knew I was hurting myself. They told me they didn't care. Sometimes I would lose points or be placed on restriction for hurting myself.
25. One time I cut myself after I had gotten into a fight with staff. I filled the room with blood. This happened on a Friday, but it wasn't until Monday that they gave me a bandage or medicine for the pain.
26. I had never cut myself before I came to the United States. I learned this from other kids while I was detained.
27. On August 21, 2017, I tried to kill myself. I tied part of a curtain around my throat. Staff found me, and they responded by taking away all of my clothes and placing me on restriction for several days.
28. I was angry that I was at Shenandoah for so long, and I didn't want to be there anymore. I would throw food down the toilet because I couldn't eat it. I would feel sick and dizzy.
29. I had the urge to cut myself frequently, and expressed a desire to kill myself.
30. In December 2017, I was transferred back to NOVA. It's better here. I don't know how long I will be here or whether I will be transferred back to Shenandoah.

31. This statement has been prepared in English but it has been read to me in Spanish by a bilingual interpreter.

32. I declare, under penalty of perjury, that all the information I have provided here is true and correct to the best of my knowledge, and I am aware of the legal consequences of making a false declaration.

Executed this 17th day of January, 2018, in Alexandria, Virginia

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John Doe 1